

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division

ROBERT FAIRE,

Plaintiff,

vs.

Case Number: 2:11-cv-478

SOUTHEASTERN PROTECTIVE
SERVICES, INC.,

Defendant.

JOINT DEPOSITION DESIGNATIONS

The parties, by counsel, in accordance with Local Rule 30(F) of the Eastern District of Virginia, and pursuant to Paragraphs 6 and 7 of the Court's Rule 16(b) Scheduling Order dated October 18, 2011, submit the following deposition designations, with each party's objections as noted:

Marty Melton

<u>Page/Line</u>	<u>Comment</u>
3/10-11	
4/6-11	
15/17-22	
19/13-17	
25/4-6	
27/21 – 29/3	
29/12-25	
33/2-23	
34/19-22	
35/1-4	
36/7-24	
37/7, 10-14	
47/12-21	
48/16 – 49/9	
54/24 – 55/1	

James Parlier

<u>Page/Line</u>	<u>Comment</u>
4/10-14	
5/22 – 8/3	
9/7 – 11/6	
16/1-14	
16/23 – 17/8	
17/17 – 18/4	
18/5-20	Plaintiff objects: Hearsay <i>Designation withdrawn</i>
19/8-24	
20/17 – 21/25	
23/6-25	Plaintiff objects: Hearsay <i>Sustained</i>
24/25 – 25/11	
25/12 – 26/2	Plaintiff objects: Hearsay; Speculation <i>Designation withdrawn</i>
28/9-21	
29/2-13	
30/13-23	
31/15 – 32/11	
38/19 – 39/13	
39/16-19	
40/2-4	
40/10 – 41/1	
48/17 – 49/11	
49/17 – 52/14	Defendant objects: Relevance, FRE 403 <i>Both designations in play agreement</i>
52/15 – 53/7	Add for Defendant if above objection overruled
54/13 – 55/10	
55/16-20	
57/23-25	Defendant objects: Relevance, FRE 403 <i>obj</i>
58/1-18	Add for Defendant if above objection overruled <i>objection sustained</i>
59/11-16	

R. Brien Ward

<u>Page/Line</u>	<u>Comment</u>
4/8-10	
5/8-25	
6/2-24	
7/11 – 10/13	
10/18 – 11/23	
15/10 – 16/4	
26/20 – 27/1-3	
27/8-10	
29/20-24	
30/5-23	
43/2-6	
45/3 46/20 out	Defendant objects: Relevance, FRE 403 <i>sustained</i>
46/23 – 24	
47/1-13 out	Defendant objects: Relevance, FRE 403 <i>sustained</i>
52/18-21	
57/21 (“Do...”) – 59/20	
62/1 65/13 in	Defendant objects: Relevance, FRE 403 sustained overruled <i>over</i>

ROBERT FAIRE

By /s/ James R. Theuer

James R. Theuer
JAMES R. THEUER, PLLC
555 E. Main Street, Suite 1410
Norfolk, Virginia 23510
(757) 446-8047
(757) 446-8048 (Fax)
jim@theuerlaw.com

SOUTHEASTERN PROTECTIVE SERVICES, INC.

By /s/ Samuel J. Webster

Samuel J. Webster (VSB #17021)

Bryan C. R. Skeen (VSB #77323)

Attorneys for Southeastern Protective Services, Inc.

WILLCOX & SAVAGE, P.C.

440 Monticello Avenue, Suite 2200

Norfolk, Virginia 23510

(757) 628-5500

(757) 628-5566 (Fax)

bskeen@wilsav.com

swebster@wilsav.com